

IN The United States District Court  
For The District of Delaware

John Robertson

v.

Correctional Medical  
System

Civ Act No.: 06-19-KAS



Motion for Discovery / Production of Documents

COMES NOW the plaintiff to move this Honorable Court to grant his motion for discovery. To support claim of liability by the defendant, as well as those dismissed without prejudice.

1) NAME of PERSON OR PERSONS RESPONSIBLE for the up keep AND MAINTENANCE of ELEVATORS At HOWARD B. YOUNG CORRECTIONAL INSTITUTION.

2) LAST date of service for the ELEVATORS ON the EAST side of the prison.

3) DATES ANY PARTS WERE REPLACED OR REPAIRED, what parts WERE they, AND who did the installation

4) ANY AND ALL video from EAST side elevator CAMERAS on 12/11

5) copy of All the plaintiffs medical records.

6) copy of every sick call slip since 12/14/05  
submitted by the plaintiff.

Respectfully Submitted,

4-6-06

John Robertson

John Robertson

P.O. Box 9561

Wilmington, DE 19809

Certificate of Service

I, John Robertson, do hereby certify that I've caused a true and correct copy of the foregoing Motion For Discovery to be sent to the following party by placing the same in the U.S. Mail on this 6th Day of April, 2006

AD:

Correctional Medical System  
12647 Olive Blvd  
P.O. Box 419052  
St. Louis, MO 63141

WARDEN RAFAEL WILLIAMS  
1301 E. 12th St. Howard B. Young Correctional Institution  
Wilmington, DE

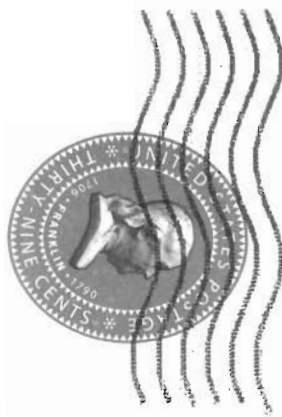
John Robertson

J. Robertson  
FBI # 541362  
P.O. Box 9561  
Wilmington, DE 19809

U.S.M.S.  
X-RAY

Office of the Clerk  
United States District Court  
844 N. King Street  
Lockbox 18  
Wilmington, DE 19801

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